

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

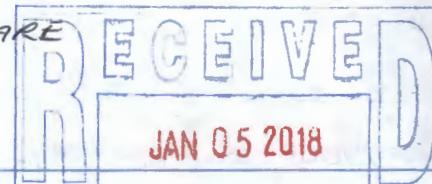
Ryan Richmond,

PLAINTIFF,

v.

CORRECT CARE SOLUTIONS LLC,

DEFENDANTS,



CA. No. 14-cv-806-LPS

001

MOTION FOR ENTRY OF DEFAULT JUDGEMENT  
UNDER FED.R.CIV.P. 55(S)

NOW COMES, PLAINTIFF RYAN RICHMOND, PRO SE,  
PURSUANT TO FED.R.CIV.P. 55(S) FOR ENTRY OF  
DEFAULT JUDGEMENT DUE TO DEFENDANT PATRICIA  
MUNDA FAILING TO ANSWER, MOVE, OR OTHERWISE RESPOND  
TO THE COMPLAINT.

1. JUNE 16, 2014, PLAINTIFF FILED HIS COMPLAINT.
2. MAY 29, 2015, PLAINTIFF AMENDED HIS COMPLAINT
3. JANUARY 13, 2016 THE USM-285 FORMS WERE SERVED  
TO THE LEGAL COUNSEL OF PATRICIA MUNDA, PAMELA  
MAGEE, CORRECT CARE SOLUTIONS LLC, SARAH CLARTI, AND  
PHYSICAL THERAPIST SHAWN.
4. JANUARY 12, 2017 THE LEGAL COUNSEL OF PAMELA MAGEE,  
AND CORRECT CARE SOLUTIONS LLC ANSWERED AND SEPARATED  
DEFENSES TO THE PLAINTIFF'S RYAN RICHMOND'S AMENDED  
COMPLAINT.
5. FEBRUARY 9, 2017 THE DEFENDANT PATRICIA MUNDA  
FAILED TO PLEAD OR OTHERWISE DEFEND THE AMENDED  
COMPLAINT THAT WAS SERVED JANUARY 13 2016

6. APRIL 11, 2017, PLAINTIFF REQUESTED FOR THE CLERK OF THE COURT TO ENTER DEFAULT ON THE DEFENDANT PATRICIA MUNDA DUE TO HER FAILING TO PLEAD OR OTHERWISE DEFEND THE AMENDED COMPLAINT THAT WAS SERVED JANUARY 13, 2016.

7. DUE TO PATRICIA MUNDA FAILING TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT, THE ENTRY OF A DEFAULT JUDGEMENT AGAINST HER IS APPROPRIATE. SEE, e.g., MUSIC CITY MUSIC V. ALFA FOODS, LTD., 616 F. Supp. 1001, 1002 (E.D. Va. 1985). WHEN A DEFAULT JUDGEMENT IS ENTERED ON THE WELL PLED ALLEGATIONS OF A COMPLAINT, THE DEFENDANT'S LIABILITY IS ESTABLISHED. SEE BROADCAST MUSIC, INC. V. R BAR OF MANHATTAN INC., 919 F. Supp. 656, 658 (S.D.N.Y. 1996); SCHWARTZ-LIEBMAN TEXTILES V. LAST EXIT CORP., 815 F. Supp. 106, 107 (S.D.N.Y. 1992). THE COURT, HOWEVER, IS REQUIRED TO CALCULATE THE APPROPRIATE AMOUNT OF DAMAGES. IT CANNOT SIMPLY ACCEPT THE PLAINTIFF'S REPRESENTATIONS ON THIS SUBJECT AS BEING TRUE. SEE BROADCAST MUSIC, 919 F. Supp. at 658; SCHWARTZ-LIEBMAN, 815 F. Supp. at 107.

Ryan K. Rich

Ryan Richmond #610572

HRYCI

P.O. Box 9561

Wilm. DE, 19809

DATED: DECEMBER 18, 2017

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

AFFIDAVIT OF SERVICE

I, RYAN RICHMOND, BEING SWORN, STATE THAT:

I HAVE SERVED A COPY OF THE ENTRY OF DEFAULT JUDGEMENT, VIA MAIL BY WAY FOR THE DEPARTMENT OF CORRECTIONS ON THE 18<sup>TH</sup> DAY OF DECEMBER, 2017.

OPHELIA M. WATERS, ID#3879  
DEPUTY ATTORNEY GENERAL  
CARVEL STATE OFFICE BUILDING  
820 N. FRENCH STREET, 6<sup>TH</sup> FLOOR  
WILM. DE, 19801

PURSUANT TO 28 U.S.C. §1746, I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Ryan Richmond

RYAN RICHMOND #610577

HRC/CI

P.O. Box 9561

DATED: DECEMBER 18, 2017

WILM. DE, 19809

Ryan Richmond  
SBI#610577  
HRYC1  
P.O. Box 9561  
Wilm. DE, 19809

新七行詩：歌詞的二重奏

02 JAN 2018 PM 27



OFFICE OF THE CLERK  
U.S. DISTRICT COURT  
844 N. KING ST. UNIT 18  
WILMINGTON DE, 19801

**U.S.M.S.  
X-RAY**

**LEGAL MAIL**

LEGAL MAIL

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